

February 21, 2023

## Via ECF

Honorable Paul G. Gardephe United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Conrad Heron</u>, 22 CR 514 (PGG)

Request of Modification of Pre-Trial Release Conditions

Dear Judge Gardephe:

I represent Conrad Heron on the above captioned matter. I am writing with the consent of Pre-trial to respectfully request modification of Mr. Heron's Pre-Trial release conditions.

Since his arraignment, Mr. Heron has been on home confinement with a radio frequency bracelet. He has resided in the District of New Jersey and has bee MEMO ENDORSED erms of his release conditions. The Defense is respectfully reque The Application is granted. conditions to be modified to curfew as directed by Pre-1 so ORDERED:

I have conferred with SDNY Pre-Trial Officer Ashley Co DNJ Pre-Trial Officer Erika Dipalma who supervises Mr. . Ashley Nicolas defers to Pre-Trial. odification. ne. AUSA

Paul G. Gardephe, U.S.D.J.

Date: February 24, 2023

I am therefore respectfully requesting that Mr. Heron be modified as outlined above. Thank you for your time and consideration for this request.

Respectfully Submitted,

<u>s/ Elena Fast</u>Elena Fast, Esq.Counsel for Conrad Heron